

**JOINT PETITION FOR THE REJECTION OF THE DEREGULATION OF
GENETICALLY MODIFIED ORGANISMS (GMOS) OBTAINED THROUGH NEW
GENOMIC TECHNIQUES (NGTS) AND FOR FILING AN APPEAL TO THE COURT OF
JUSTICE OF THE EU FOR THE PURPOSE OF REVIEWING THE LEGALITY OF THE
REGULATION**

Dear Prime Minister, Dear Minister of Agriculture, representatives of the state administration, and elected representatives of the citizens of Slovakia,

We, the undersigned representatives of civil society, professional organizations, and public figures, hereby express our appreciation for your consistent opposition to the proposal for the deregulation of GMOs obtained through New Genomic Techniques (NGTs). At the same time, we address you with an urgent joint petition: we request that the Slovak Republic, in the interest of protecting the health of its citizens, biodiversity, transparency, and food sovereignty, maintain its dissenting position and file an appeal to the Court of Justice of the European Union (CJEU) to review the legality of the regulation being approved.

In December 2025, the trilogue was concluded, and indications from EU institutions suggest that this controversial Proposal for a new regulation on plants obtained by certain new genomic techniques will be definitively approved in the coming months. The adoption of the regulation in its current form would mean the exemption of Category 1 NGT plants from the regulatory framework for GMOs, as they are arbitrarily equated to conventional crops in the proposal. In practice, this means the end of mandatory labeling of products of new genomic techniques as GMOs, the absence of risk assessment, and the loss of traceability and the possibility of banning them.

In this context, we emphasize the fundamental points of the proposal's systemic failure:

- **Destruction of market transparency and loss of consumer sovereignty:** The proposed deregulation directly interferes with the fundamental right of the consumer to know what they are consuming. By abolishing the mandatory labeling of NGT crops as GMOs, the state resigns from consumer protection and deprives them of freedom of choice. The citizen will no longer be able to distinguish between conventional food and food with modified DNA, which we consider an unacceptable interference with personal integrity and the ethical values of the population.
- **Threat to economic competition, liquidation of organic farming and non-GMO production:** The proposed deregulation will make it impossible for growers and processors in conventional and organic farming to guarantee the absence of genetically modified components. The loss of transparency and traceability for Category 1 NGTs will lead to irreversible contamination of supply chains, undermining public trust and devaluing investments in non-GMO production. Furthermore, we point out the critical risk of monopolization of the European seed market. A narrow group of multinational corporations is already patenting thousands of plants in this category, which, combined with deregulation, will create an unacceptable technological and economic dependence of Slovak farmers on external patent holders. Such development directly threatens the food security and sovereignty of the Slovak Republic, as control over the fundamental link in the food chain—the seed—is transferred into the hands of a small group of global actors.
- **Absence of scientific consensus and violation of the precautionary principle:** There is no relevant evidence regarding the safety of NGT plants and no studies demonstrating their equivalence to conventionally bred crops. On the contrary, numerous peer-reviewed studies point to the occurrence of undesirable DNA mutations that may lead to the formation of new toxins or allergens. We perceive the exemption of these technologies from the mandatory risk assessment process as a direct violation of the precautionary principle enshrined in primary EU law.

- **Uncontrolled spread in the environment and threat to biodiversity:** NGT crops represent an unpredictable risk to natural ecosystems. Given their ability to freely crossbreed with wild relatives and conventionally bred plants, there is a risk of uncontrolled transfer of modified genetic material into the wild. This process can lead to permanent genetic contamination of the original gene pool, loss of biodiversity, and disruption of ecological balance, while the rectification of such changes is practically unfeasible. At the same time, we highlight the high risk for non-target organisms, primarily for bees and other pollinators. Changes in the plant genome can lead to unpredictable changes in the composition of nectar and pollen, directly threatening the health and reproductive capacity of bee colonies. The disruption of natural food chains and potential toxicity to insects can cause the destabilization of the entire ecological balance. Since bees are a key indicator of a healthy environment and a pillar of agricultural production, we consider any unregulated expansion of NGT crops without a prior impact assessment on these populations to be a gamble with the biological security of the state.
- **Ignoring the will of citizens:** Almost 70 organizations in Slovakia, as well as citizens through a successful petition and mass comments—which were accepted by the Ministry of Agriculture and Rural Development of the SR—have previously clearly opposed the deregulation of new GMOs obtained through NGTs. Public opinion polls confirm this society-wide demand for maintaining strict regulation and transparency, which unites people across the entire political spectrum.

Legal and strategic reasons for filing a motion:

- **Conflict with CJEU case law:** The proposal bypasses judgment C-528/16, which confirmed that new mutagenesis techniques create GMOs and are subject to relevant regulatory rules.
- **Conflict with Art. 169 TFEU:** EU law guarantees a high level of consumer protection and the right to information. The document being approved consciously suppresses this right in favor of the commercial interests of a narrow group of multinational corporations.
- **Precautionary principle (Art. 191 TFEU):** The proposal ignores the absence of scientific consensus on the safety of NGTs and the risks to health and the environment.
- **Collision with the Cartagena Protocol:** The SR, as a signatory to an international treaty on biosafety, cannot accept the abolition of individual risk assessments for GMOs.

The Slovak Republic has a unique opportunity to stand up for the protection of its citizens, the environment, and European standards. We possess independent legal analyses confirming that with a timely filing of the motion—for which the SR has a strict **two-month deadline** from the publication of the regulation—our state has an exceptionally high chance of success, thereby fulfilling its promise to maintain current GMO regulations (Acceptance of the petition: Maintain strict regulation and labeling of new GMOs). We attach the aforementioned legal analyses as an annex to this letter.

We therefore request the rejection of NGT deregulation and the issuance of an instruction to coordinate preparations between the Government Office, the Ministry of Agriculture and Rural Development, and the Ministry of Foreign and European Affairs of the SR **to file an appeal to the Court of Justice of the EU** to assess the compliance of the regulation with EU law. Simultaneously, we request a personal **meeting with the petition coordinators**, where we would present complete legal documentation and the positions of the professional and general public.

We believe that you will stand up for the protection of Slovak consumers and their right to safe and transparent food. We expect that you will prioritize the strategic interests of the Slovak Republic in

the areas of food security, sovereignty, and biodiversity protection over narrow commercial interests.

Respectfully,

Title First Name Last Name - profession, expertise, etc.

Name of organization

International support for the petition:

The following experts and organizations from abroad also join this submitted petition:

Title First Name Last Name - profession, expertise, etc., country

Name of organization, country

Annexes:

1. Original and translation of the legal analysis *Kommissionsvorschlag einer verordnung über neue genomische techniken (NGT): zur Verletzung des vorsorgeprinzips* by a collective of authors: 1x + 1x
2. Original and translation of the legal analysis *Legal grounds to Challenge NGTs deregulation* by Artemisia: 1x + 1x
3. Original and translation of the shortened version of the legal analysis *EU-verordnung über neue genetische Techniken (NGT): zur Verletzung des vorsorge-prinzips* by Dr. Georg Buchholz: 1x + 1x
4. Original and translation of the legal analysis *EU-verordnung über neue genetische Techniken (NGT): zur Verletzung des vorsorge-prinzips* by Dr. Georg Buchholz: 1x + 1x

Expression of support is tied to the content of this petition. Other signatories were not known to individual participants at the time of signing.

Given the strategic importance of the issue at hand, this petition is submitted for the attention of all relevant constitutional officials and representatives of the state administration: the President of the SR, members of the Government of the SR (especially the ministers of agriculture, environment, health, and defense), as well as Members of the European Parliament elected for the Slovak Republic and other affected public authorities.